

# Memorandum

To: MR. LEW WOOD-9  
District Director

Date: November 30, 1993

File No.:

From: DEPARTMENT OF TRANSPORTATION  
DIVISION OF MAINTENANCE

Subject: Working Committee - Selection of Alternate Routing for the Shipment of Radioactive Materials (RAM)

This is in response to your memorandum dated November 10, 1993. Our representative for the California Highway Patrol (CHP) Working Committee for highway route controlled quality (HRCQ) shipments of RAM, Tim Plaza, has communicated your concerns to Lt. Mike Goshern of the CHP Hazardous Materials Section.

Lt. Goshern is responsible for the committee and its twofold goals to establish open communications and support for any routes designated for HRCQ shipments of RAM and to consult with government and industry representatives to gain valuable input for the formation of regulations and the designation of RAM routes.

Currently, CHP has not formally designated any routes for RAM shipments in California. They have informed us that they are looking into utilizing Interstate Highways only. The use of State Routes may be considered at a later time; however, in either case, they have assured us that the government agencies that have any of the Interstates and/or State Routes in their sphere of influence will be given the opportunity to voice their concerns at meetings or review any proposals before final designation is established. CHP is diligently working on establishing the designated routes and assured us that our District personnel and local governments will have the opportunity to participate in this process.

Please contact me or Tim Plaza at Calnet 464-6723 or (916) 654-6723 if you have any questions.



BOB COLEMAN, Chief  
Division of Maintenance

cc: TBeggs  
LFDeter  
TFPlaza  
DTenBroeck

TFP:lva

# Memorandum

To : Lee Deter, Deputy Director  
Transportation Management

Date : November 10, 1993  
File : Rte. 127

Attn. : Bob Coleman, Division Chief  
Division of Maintenance

From : **DEPARTMENT OF TRANSPORTATION - District 9**  
Lewis K. Wood, District Director

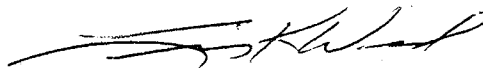
Subject : Working Committee - Selection of Alternate Routing for the Shipment of Radioactive Materials

We understand that Tim Plaza, Office of Emergency Management, was selected to represent Caltrans on a Working Committee organized by the California Highway Patrol. The purpose of the committee is for the selection of preferred highway routes for controlled quantity shipments of radioactive materials.

*We have some concerns regarding the adequacy of Route 127 should it be selected.*

Katy Walton of our Transportation Planning Department talked with Tim Plaza on November 9, 1993 about some of these concerns. He related to her that the committee had one meeting on August 30, 1993. He said no specific proposed routing or concerns were discussed. Then he received a letter from the CHP thanking him for his participation. We would like to know if there will be further consultative meetings, if the Notice of Proposed Rule Making, to be issued this month, designates routing, and if we will have other opportunities to express our concerns? Does Mr. Plaza's participation in the one meeting represent the only review and comment opportunity for Caltrans, and does the "no comment" at that meeting indicate concurrence? We appreciate if you would get a clarification on these questions. Thank you for looking into this.

Sincerely,



LEWIS K. WOOD  
District Director  
District 9

Memo to the File

From: Katy Walton

Subject: Route 127

On November 8, 1993 at approximately 3 P.M. Katie Grassmeyer (sp), DOE Transportation Coordinator for Yucca Mtn., called me. She asked if Caltrans is now the lead agency in designating alternate routing in California. I said, no, what had given her that idea? She said that she was told this by someone at the University of Nevada at Reno. I asked her if that might have been Maria. She said, yes, she thought so. I said that I can't imagine why Maria would have thought that. I said as far as I was concerned the CHP were still the lead agency and hadn't heard anything to the contrary. I told her that the CHP had recently set up a working committee statewide and we had a representative on that committee from OEM. I explained that the only time we would be the lead agency is if there was a project on the transportation system, otherwise we are a responsible agency in reviewing other developments and how they might affect our transportation system. I told her I had been working with Officers Kevin Livingston and Harry Kallipis of the CHP, Office of Hazardous Waste in Sacramento, and offered to give her Kevin's phone number which I did. I related this information to Brad Mettam at 3:30 P.M. Brad and I both felt this was very odd as Katie should know that the CHP is the lead agency. Brad was going to call Maria and see if she has a misconception.

On November 9, 1993 I called Tim Plaza, OEM to find out how the meetings were going, what was happening and to express some of our concerns on Route 127. Tim related to me that they had had one meeting on August 30, 1993, and that it was basically the CHP telling them what they have done so far. He said they did not discuss specific concerns or routes. Then he received a thank you letter from the CHP dated October 1, 1993 for his participation. This letter also said that the proposed rulemaking will be published in November of 1993. Tim said he did not get the impression that they would be having any more meetings, and also felt that they may be designating routing in the proposed rulemaking. I discussed with my boss, Ken Deboy, earlier that I planned to call Tim, express my concerns and follow it up in writing for Lew's signature. Ken agreed to the plan. So I had drafted a letter for Lew's signature before the actual conversation. Lew reviewed the letter on **November 10** and felt it was too lengthy. At that time I updated him on Tim's and my conversation. Lew and I discussed the letter and felt we better go straight to Lee Deter, Attn: Bob Coleman with it. So I abbreviated the letter and FAXED it to the Director's office (Terri Cimino did this on her fax ma.). I then called Brad Mettam and related to him what I was doing. He expressed concerns about Inyo and Caltrans being left out of the loop. I then called Tim (November 10, 1993 at 4:50 P.M.) to tell him that the letter would not be going to his boss but instead to his boss's boss. Tim said that he had just gotten off the phone with Mike Goshern, Lt Commander, CHP Hazardous Materials Section. Mike had told him that Route 127 is not being considered, that they are only looking at the interstate system. There would be plenty of opportunities for input as they still had to go through public hearings. They are still early in the process. Tim did not think we had anything to worry about, and that Mike and the CHP seem to be very cooperative. I told Tim that the CHP have always been congenial and friendly, willing to listen, but that both Inyo County and I have been trying to communicate with them for several years, and we make all the contacts and efforts (overtures). We have both asked to be on their committee and were ignored, Inyo has made several requests which were ignored, and we have both felt frustrated in dealing with them.

November 12, 1993. I faxed a copy of the letter from Lew Wood to Lee Deter, to Brad at 8:30 A.M. I also asked Brad to call me as I had more news. At 9:45 A.M. Kevin

Livingston called me. Officer Livingston said that he had been given a cryptic note saying that a Barbara from District 7 had some concerns about Route 127. She had been working with a Brad Mettam of Inyo County. I asked, was that District 7, a Caltrans district? He said that it was. I said, I wonder why anyone in L.A. would be concerned with Route 127. I said that I had a call into Brad and will ask him. Then Kevin said that Route 127 is not being considered for Radioactive Materials shipments as a designated route, that it may be looked at later when high level waste may be shipped, and that during their annual review of the routes additional routes may be considered. He said that they will involve us and our concerns during the annual review process if Route 127 is considered then. I said that I was dumbfounded (he laughed and said, "dumbfounded?"). I said, well shocked then. He asked, why. I said that the studies that Nevada has done identify clearly that I-15, I-40 and Route 127 are the logical routes, and they were just waiting for California to do their studies. Kevin said that they were working with a Mr. Luntz (sp) of Nevada DOT about their plans. Kevin said that the first go around will be a modified interstate system. I asked, what was being modified. He said, bypass routes in the L.A. and Bay areas. He said that it still had to go through the administrative and legal reviews, that determination will probably be out in August, 1994, and that the first annual review in August, 1995 would be the soonest Route 127 would be designated if considered. I asked Kevin how far along was Mark with the HAZTRANS modeling, and was he considering Route 127 in the model. Kevin said that as far as he understood the capabilities of emergency response and CHP locations were as far as he's gotten, and only interstates were being modeled. I told Kevin that District 8 was doing Goods Movement surveys on I-15 and I-40, and he may be interested in these results. Kevin said that a Doug somebody of District 8 (I said, Doug Houge probably) had come to Sacramento and reviewed their model. I explained to Kevin why both Inyo and Caltrans were concerned, that the infrastructure of Route 127 needs to be considered, that we were not pro or con it being designated, only that the potential impacts be assessed and mitigated if needed. He said, "and federal funding provided to do those improvements". I said, "yes, I'd hate to see the State give away any rights to require improvements by designating the route. Designation in itself implies that the facility is adequate. We need that to be qualified, or the State needs to retain the right to require improvements". He said he understands where we are coming from, and he tried to assure me that when the time comes that our concerns will be looked at, and that they want to work with us. I told Kevin that our District Director had just sent a letter to high-ups in our HQs office, so Kevin could expect a call from them about the status of the process and some of our concerns.

At 11 A.M. I related the conversation I had with Kevin to Brad. Brad did not know of any Barbara in District 7. We theorized but couldn't determine what the note to Kevin was about. Brad and I discussed the possibility that by the CHP designating only interstates, then the State would be allowing the carriers to use Title 49 of the Code of Federal Regulations Section 177.825, subsection (B)(2) as a loophole. Route 127 could be used without it formally being designated. This section provides for the carrier to deviate from the preferred routing for pickup and delivery points using the shortest-distance route. Brad and I discussed how we both feel a certain amount of distrust in past dealings with the CHP and their motives. Brad wanted to talk with Peter Chamberlin, his boss, about the latest information. He was going to call Maria at UNR and possibly one of his contacts in the Nevada DOT. We both agreed that the Title 49 provision should be looked at for a legal interpretation. If the carriers are allowed to select shortest-distance routing then the State (and DOE) may be absolving themselves from designating and/or even considering impacts on Route 127. Brad will call me back.

State of California—Business, Transportation and Housing Agency

PETE WILSON, Governor

## DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

P.O. Box 942898

Sacramento, CA 94298-0001

(916) 445-3253

1-800-735-2929 (TDD)



June 24, 1993

Dale Ten-Brock, Chief  
Office of Emergency Management  
Department of Transportation  
1120 N Street, Room 3214  
Sacramento, CA 95814

Dear Mr. Ten-Brock:

The California Highway Patrol (CHP) is in the initial process of designating a preferred route system for the through transportation of ~~highway routes controlled~~ ~~material~~ (HRCQ) shipments of ~~hazardous materials (RAM)~~. The CHP is California's routing agency as defined in Title 49 of the Code of Federal Regulations Part 177.825, and mandated to designate preferred routes by Section 33000 of the California Vehicle Code.

As part of the implementation process, the CHP is conducting a meeting comprised of representatives from industry, state, federal and local governments. The purpose of this letter is to invite your organization to participate in this consultative meeting. Other organizations invited to participate are identified on the enclosed list. (Enclosure A)

Our purpose in conducting this meeting is twofold:

1. To encourage open communication and support for the routes designated for HRCQ shipments of RAM by involving representatives of government and industry early in the implementation process.
2. To consult with government and industry representatives to gain valuable input/information necessary for the formation of regulations and the designation of RAM routes.

The meeting will provide attendees an opportunity to become familiar with our study, discuss the proposed methodology and provide feedback to CHP, Hazardous Materials Section staff. A specific goal of this meeting is to review the preliminary routes and accurately identify any significant problem areas and possible alternate routes.

Dale Ten-Brock, Chief

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June 24, 1993

I hope you can find the time to attend this meeting scheduled for August 30, 1993, 9:00 a.m. - 3:00 p.m., at the CHP Academy, 3500 Reed Avenue, West Sacramento, CA 95605, Classroom 1A, (See map, Enclosure B). Upon arrival, please sign in and obtain a visitor's pass at classroom 1A.

Due to the limited space, we would appreciate your organization sending only one representative. If you are not able to attend the meeting, but would like to review the CHP's Radioactive Materials Transportation Routing Study, please notify us so we can add your name to the interested parties mailing list.

Please confirm your participation by submitting the name and title of your representative to the California Highway Patrol, Attention: Hazardous Materials Section, 444 North 3rd Street, Suite 310, Sacramento, CA 95814-0227. You may respond by mail or fax (916-446-4870) using the lower half of Enclosure A or call Sergeant Harry Kallabis at (916) 327-3310.

Very truly yours,



T. W. Ross  
Assistant Chief  
Enforcement Services Division

Enclosures  
File No.: 60.11309\ram\augmtg.ltr

State of California—Business, Transportation and Housing Agency

PETE WILSON, Governor

## DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

P.O. Box 942898

Sacramento, CA 94298-0001

(916) 327-3310

1-800-735-2929 (TT/TDD)



October 1, 1993

File No.: 66.A9614\wpwin\ram\ramty.ltr

*Tim*  
Tim F. Plaza, Asst. Chief  
Office of Emergency Management  
Department of Transportation  
1120 N Street, Room 3214  
Sacramento, CA 95814

Dear Mr. Tim Plaza:

We wish to convey our thanks to you for participating in the Highway Route Controlled Quantity Shipments (HRCQ) of Radioactive Materials (RAM) Routing Consultative Meeting on August 30, 1993. Your participation and comments were appreciated and will be valuable to us as we complete the proposed regulations package.

We anticipate the proposed rulemaking will be published in November of 1993. We will ensure that you receive a copy of both the proposed rulemaking and the routing study as soon as they are published.

Very truly yours,

*M. Goshern*  
M. GOSHERN, Lieutenant  
Commander  
Hazardous Materials Section

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RESERVATION FORM  
(due by July 30, 1993)

Mail to the address below or FAX (916) 446-4870

California Highway Patrol,  
Hazardous Materials Section  
444 N. 3rd, Suite 310  
Sacramento, CA 95814

Please Check One:

- ☒ A representative of our organization will attend the consultative meeting at the California Highway Patrol Academy.
- ☐ Our organization will not be represented at the consultative meeting. However, we would like to receive a copy of the information discussed at the meeting. Please include us on your mailing list.
- ☐ Our organization will not be represented at the consultative meeting. We do not feel this RAM study will significantly impact our organization.

Please provide contact name, organization name, address and phone number:

Tim F. Plaza

Caltrans

1120 N Street, Room 3214

Sacramento, CA 95814

Phone: 916/654-6723

FAX: (916) 653-3291



## **HRCQ RAM CONSULTATIVE MEETING**

### **AGENDA**

**Date:** August 30, 1993  
**Time:** 0900-1500 Hours  
**Location:** CHP Academy Room 5

<b>0900-0930</b>	<b>Introductions and Opening Comments</b>	<b>Chiefs Edgerton/Ross CHP</b>
<b>0930-1020</b>	<b>Overview of Federal Routing Guidelines</b>	<b>Lt. Goshern CHP</b>
<b>1020-1040</b>	<b>Break</b>	
<b>1040-1130</b>	<b>Discussion of Proposed Routing Study</b>	<b>Sgt. Kallabis CHP</b>
<b>1130-1200</b>	<b>HazTrans Methodology and Programming</b>	<b>M. <sup>ACK</sup>Lapofski AAI</b>
<b>1200-1300</b>	<b>Lunch</b>	
<b>1300-1330</b>	<b>Presentation of HazTrans Software</b>	<b>AGPA Schurer and Ofc. Livingston CHP</b>
<b>1330-1500</b>	<b>Round Table Discussion</b>	<b>All Attendees</b>